

Submitter : Dr. Joshua Hedman
Organization : DVA - Chicago (Jesse Brown VA)
Category : Physician

Date: 05/23/2005

Issue Areas/Comments

GENERAL

GENERAL

RE: CMS-3122-P

Hospital Conditions of Participation: Requirements for History and Physical Examinations; Proposed Rule (70 Fed. Reg. 15266, March 25, 2005)

Dear Dr. McClellan:

I am a podiatric physician and support the proposed revision to the Medicare Conditions of Participation (CoPs) for Hospitals, which specifies that a medical history and physical examination must be completed for each patient by a physician (as defined in section 1861(r) of the Act) or other qualified individual who has been granted these privileges by the medical staff in accordance with State law.

Podiatric physicians attend four years of podiatric medical school after college and, as part of the educational experience, receive training in the classroom and in clinical settings in the performance of histories and physicals (H&Ps). Upon graduation from a podiatric medical school, individuals are fully qualified to perform H&Ps.

Based on the education, training and experience of podiatric physicians, I believe that the proposed change to the H&P requirement is appropriate and I urge the Centers for Medicare & Medicaid Services (CMS) to finalize it without delay.

Thank you for your consideration of these comments.

Sincerely,

Joshua Hedman, DPM

Submitter : Dr. Dipika Patel
Organization : Jesse Brown VA medical center
Category : Physician

Date: 05/23/2005

Issue Areas/Comments

GENERAL

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Thank you for your consideration of these comments.

Sincerely,
Dipika Patel, DPM

Submitter : Dr. Arthur Wolfson
Organization : American Podiatric Medical Association
Category : Physician

Date: 05/23/2005

Issue Areas/Comments

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Thank you for your consideration of these comments.

Sincerely,

Arthur F. Wolfson, D.P.M.

Submitter : Dr. Janet Simon
Organization : Dr. Janet Simon
Category : Physician

Date: 05/23/2005

Issue Areas/Comments

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Thank you for your consideration of these comments.

Sincerely,
Janet Simon, DPM
Podiatry Associates of New Mexico
8300 Carmel NE Ste 501
Albuquerque, NM 87122
505-797-1001

Submitter : Dr. Marshall Solomon
Organization : Council of Teaching Hospitals, AACPM
Category : Academic
Issue Areas/Comments

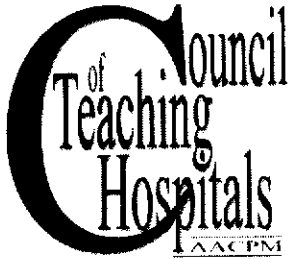
Date: 05/23/2005

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See Attachment

CMS-3122-P-255-Attach-1.DOC



American Association of Colleges of Podiatric Medicine
15850 Crabbs Branch Way, Suite 320
Rockville, MD 20855-2622
301-948-9764 (v)
301-948-1928 (f)
www.COTHweb.org

May 16, 2005

Mark B. McClellan, MD, PhD
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-3122-P
P.O. Box 8010
Baltimore, MD 21244-8010

RE: CMS-3122-P

Comments on Medicare and Medicaid Programs; Hospital Conditions of Participation: Requirements for History and Physical Examinations; Proposed Rule (70 Fed. Reg. 15266, March, 25, 2005)

Dear Dr. McClellan:

On behalf of the Council of Teaching Hospitals (COTH) of the American Association of Colleges of Podiatric Medicine (AACPM), the national educational organization that represents over 200 hospitals and organizations that conduct graduate training in podiatric medicine, we are pleased to provide comments on the proposed rule that would revise four of the current hospital conditions of participation (CoPs) for approval or continued participation in the Medicare and Medicaid programs.

The COTH supports the proposed revision to the medical staff requirement at § 482.22(c)(5) to specify that a medical history and physical examination must be completed for each patient by a physician (as defined in section 1861(r) of the Act) or other qualified individual who has been granted these privileges by the medical staff in accordance with State law.

The profession's residency programs are resource-based, competency-driven and assessment-validated. Of the seven institutional and program standards and requirements for podiatric residencies, program standard 6.0 states, in part *"The residency program in either Podiatric Medicine and Surgery-24 (PM&S-24) or Podiatric Medicine and Surgery-36 (PM&S-36) ... provides training resources that facilitate the resident's sequential and progressive achievement of specific competencies."* Specifically, Section 6.1 states, *"The curriculum must provide the*

resident appropriate and sufficient experiences in the supervised diagnosis and management of patients with a variety of diseases, disorders, and injuries ... assess and manage the patient's

Dr. Mark McClellan
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general medical status ... [and] perform and interpret the findings of a comprehensive medical history and physical examination (including preoperative history and physical examination)." (CPME:320, July 2003). Podiatric residents perform comprehensive history and physical examinations throughout their training, with increased levels of autonomy, within rotations such as internal medicine, general medicine, general surgery, vascular surgery, emergency medicine as well as podiatric medicine and surgery.

Podiatric physicians are, by education and training, capable of performing a comprehensive history and physical examination for any of their patients. The COTH is pleased with the proposed revisions to the hospital CoPs involving H&Ps and we look forward to them being finalized immediately.

If you have questions concerning our comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, reading "Marshall G. Solomon". The signature is written in a cursive, flowing style.

Marshall G. Solomon, DPM
Chairman
Council of Teaching Hospitals, AACPM

cc: COTH Administrative Board
AACPM Board of Directors